



October 16, 2009

Dr. Ruth M. Lunn
National Institute of Environmental Health Sciences
P.O. Box 12233
MD K2-14
Research Triangle Park, N.C. 27709

Re: Comments on the National Toxicology Program's Draft Background Document for Formaldehyde

Dear Dr. Lunn:

The Formaldehyde Council, Inc. (FCI)¹ is pleased to have the opportunity to provide comments to the National Toxicology Program regarding the Draft Background Document for formaldehyde². While FCI supports the attached comments, they represent the independent analyses and conclusions of the authors.

- *Comments on National Toxicology Program Draft Background Document for Formaldehyde*, prepared by Gary M. Marsh, Ph.D., F.A.C.E., Professor and Interim Chairman of the Department of Biostatistics and Director of the Center for Occupational Biostatistics and Epidemiology at the University of Pittsburgh, Graduate School of Public Health. (Attachment A)
- *Assessment of the Weight of Evidence of Formaldehyde as a Human Carcinogen*, prepared by Lorenz R. Rhomberg, Ph.D. at Gradient, Corp. (Attachment B)
- *Comments on the Report on Carcinogens Draft Background Document for Formaldehyde, September 3, 2009, U.S. Department of Health and Human Services, Public Health Service, National Toxicology Program: Biological Mechanisms for Formaldehyde-Induced Leukemia*, prepared by Robert Golden, Ph.D. at ToxLogic, L.L.C. (Attachment C)
- *A Meta-Analysis of Formaldehyde Exposure and Risk of Leukemia and Nasopharyngeal Cancer*, prepared by Kenneth A. Mundt, Ph.D. at ENVIRON International Corporation (Attachment D)
- *Comments on the Draft Background Document on Formaldehyde Exposure and Risk of Cancer*, prepared by James Collins, Ph.D. at Dow Chemical Company (Attachment E)

If you have any questions regarding the attached please do not hesitate to contact me at 703.741.5750 or bnatz@formaldehyde.org.

Sincerely,

A black rectangular box redacting the signature of Betsy Natz.

Betsy Natz
Formaldehyde Council, Inc.

¹ FCI is a trade association of leading producers and users of formaldehyde that is dedicated to promoting the responsible use and benefits of formaldehyde and ensuring its accurate scientific evaluation. For more information, please see <http://www.formaldehyde.org>.

² 74 Fed. Reg. 44845 (Aug. 31, 2009).